

ETHICAL CODE

The present manifesto represents LUBRITEX SRL's commitment to uphold high ethical standards, promote sustainability, and adopt responsible practices in the areas of governance, social aspects, and the environment. This Code of Ethics provides guidance to our employees, partners, and other stakeholders on how to conduct company activities in an ethical and sustainable manner, thereby contributing to creating a positive impact on society and the environment in which we operate.

Governance

1.1 Transparency and responsibility:

The company is committed to operating with transparency in its activities, providing the disclosure of relevant information to all stakeholders.

1.2 Conflict of interest:

Employees must avoid any situation that could create a conflict between personal interests and those of the company. In the event of a potential conflict, employees must promptly report it to the management.

1.3 Corruption and illicit practices:

The company strongly condemns corruption and any form of illegal practices. Employees are required to operate in compliance with laws and regulations and to report any suspicious activities.

Social Aspects

2.1 Respect for human rights:

The company respects and promotes fundamental human rights, ensuring equal treatment and the inclusion of all employees, without any discrimination based on race, ethnicity, gender, religion, sexual orientation, or other personal characteristics.

2.2 Health and safety at work:

The company is committed to providing a safe and healthy work environment for its employees. We support the adoption of preventive measures to ensure health and safety at work and provide ongoing training to prevent accidents.

2.3 Employee welfare:

The company promotes employee well-being through support, training, and workplace flexibility to enhance the quality of life for our collaborators.

Environmental aspects

3.1 Environmental sustainability:

The company is committed to reducing the environmental impact of its activities by adopting sustainable practices, such as waste recycling, energy savings, responsible use of resources, and the promotion of low-emission technologies.

3.2 Biodiversity conservation:

The company is committed to support efforts to protect biodiversity and local ecosystems, aiming to minimize the negative impacts of its activities on the natural environment.

3.3 Involvement in the community:

The company is committed to offer its support to the local community and other stakeholders to identify issues and support their development, and to promote projects that contribute to sustainability.

Report and Respect of the Ethical Code

4.1 Reporting channel:

The company provides a confidential and accessible reporting channel for all employees, so that they can report violations or unethical behaviors.

4.2 Respect for the Ethical Code:

All employees of LUBRITEX SRL are required to read, understand, and adhere to this Code of Ethics. Failure to comply with these guidelines may result in disciplinary actions, including possible termination of employment.

Signatories of the Policy and date of issuance or revision:

CEO: MARIA GRAZIA ROMEO

08/2023

